

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 19-14577
Shirley M Upshur	:	Chapter 13
	:	Judge Magdeline D. Coleman
Debtor(s)	:	* * * * *
	:	
Wells Fargo Bank, N.A.	:	
	:	Movant,
vs	:	
	:	
Shirley M Upshur	:	
Charles E Upshur	:	
	:	
William C. Miller	:	
	:	Respondents.

**WELLS FARGO BANK, N.A.'S NOTICE OF DEBTOR'S REQUEST FOR
FORBEARANCE DUE TO THE COVID-19 PANDEMIC**

Wells Fargo Bank, N.A. ("Creditor") by and through undersigned counsel, hereby submits Notice to the Court of Shirley M Upshur ("Debtor") request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor has requested a forbearance period of 3 months and has elected to not tender payments to Creditor that would have come due on the mortgage starting April 1, 2020 through June 1, 2020, and will resume payments beginning July 1, 2020. Creditor holds a secured interest in the real property commonly known as 1935 South 21st Street, Philadelphia, PA 19145.

Creditor does not waive any rights to collect the payments that come due during the forbearance period. Debtor will be required to cure the delinquency created by the forbearance period. If Debtor fails to make arrangements to fully cure any arrears resulting from the

forbearance period, Creditor reserves the ability to seek relief from the automatic stay upon expiration of the forbearance period.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

Sarah E. Barngrover (323972)

Manley Deas Kochalski LLC

P.O. Box 165028

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Attorneys for Creditor

The case attorney for this file is Karina Velter.

Contact email is kvelter@manleydeas.com

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Charles E Upshur :
:
William C. Miller :
Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Wells Fargo Bank, N.A.'s Notice of Debtor's Request for Forbearance Due to the COVID-19 Pandemic was served on the parties listed below via e-mail notification:

Office of U.S. Trustee, Party of Interest, (Registered address)@usdoj.gov

William C. Miller, Chapter 13 Trustee, Chapter 13 Trustee, P.O. Box 1229, Philadelphia, PA 19105

Brandon J Perloff, Attorney for Shirley M Upshur, 415 S. Broad Street, Unit 2R, Philadelphia, PA 19147, bperloff@perlofflaw.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on May 13, 2020:

Shirley M Upshur, 1935 S. 21st Street, Philadelphia, PA 19145

Shirley M Upshur and Charles E Upshur, 1935 South 21st Street, Philadelphia, PA 19145

DATE: May 13, 2020

/s/ Karina Velter

Karina Velter, Esquire (94781)

Adam B. Hall (323867)

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